

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**In re Lihua International, Inc. Shareholder
Derivative Action**

Case No. 1:14-cv-03543-RA-RLE

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
PROPOSED DERIVATIVE SETTLEMENT**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE THAT Plaintiffs Sreeram Arshanapally and Eric Morrison (“Plaintiffs”) respectfully move this Court for an order preliminarily approving the proposed derivative settlement of the above-captioned action (the “Shareholder Derivative Action”).

This motion is supported by the accompanying Memorandum of Law, the Declaration of Timothy W. Brown and the exhibits annexed thereto, including the Stipulation of Settlement dated March 22, 2017 and all of the prior pleadings and proceedings herein, and such other written or oral argument as may be permitted by the Court.

Dated: March 22, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on March 22, 2017, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the counsel of record in this matter who are registered on the CM/ECF.

/s/ Timothy W. Brown
Timothy W. Brown